



April 27, 2022

Dear Interested Citizen:

Thank you for your thoughtful review and comments on a proposal by Montana Fish, Wildlife & Parks (FWP) for the annual release of pen-raised ring-necked pheasants on suitable state lands.

As stated in the draft Environmental Assessment (EA), in March of 2021 a new pheasant release program was established to support recruitment, retention, and reactivation (R<sup>3</sup>) efforts in Montana following legislative action. This program aims to engage youth in the sport of hunting, promote hunter success, and provide additional hunting opportunities for hunters of all ages.

Under this legislation, FWP would develop and implement this program and release up to 50,000 pheasants annually on suitable and eligible state-owned lands. Some releases would occur a few days before the youth pheasant season opener to maximize opportunity for youth hunters, and some releases could occur later in the months of October and November to increase hunting opportunities for all hunters.

The authority granted by the Legislature only allows FWP to purchase and release birds on state-owned lands. Therefore, it is not appropriate to explore alternative uses for these funds in this EA. The analysis is therefore limited to the potential impacts on releasing up to 50,000 birds on state lands.

After evaluation of the draft EA and public comments, it is FWP's decision to proceed with the proposed action as outlined in the EA.

Enclosed you will find a Decision Notice that describes this decision in detail, as well as agency responses to public comment. Upon completion of this public involvement process, FWP accepts the draft EA as final. Appendix B includes all comments received on the proposed action during the public comment period.

Respectfully,



Hank Worsech, Director

Decision Notice for  
Annual Release of Pen-raised Ring-necked Pheasants  
Programmatic Environmental Assessment  
April 27, 2022

**Background and Description of Proposed Project**

This Decision Notice follows a draft programmatic Environmental Assessment (EA) prepared for the proposed annual release of ring-necked pheasants on suitable state lands. Funding was authorized for this project in HB 637 during the 67<sup>th</sup> Montana State Legislature. Under this authority, \$500,000 from both the federal and state special revenue funds for a total of \$1,000,000 would be available annually to purchase pen-raised pheasants for release on state lands in support of hunter recruitment, retention, and reactivation (R<sup>3</sup>) efforts in Montana. The R<sup>3</sup> effort aims to engage youth in the sport of hunting, promote hunter success, and provide additional hunting opportunities for hunters of all ages.

Under this legislation, FWP will develop and implement this program and release up to 50,000 pheasants annually on suitable and eligible state-owned lands, which total approximately 1,584,780 acres. Some releases would occur a few days before the youth pheasant season opener to maximize opportunity for youth hunters, and some releases could occur later in the months of October and November to increase hunting opportunities for all hunters.

Funds will be used to set up initial pheasant-rearing operations through Montana Correctional Enterprises (MCE) at the Montana State Prison in Deer Lodge.

**Montana Environmental Policy Act (MEPA and Public Involvement)**

Under MEPA, FWP is required to assess impacts to the human and natural environment and to inform and involve the public in the decision-making process. The EA evaluated the potential impacts of the following alternatives:

**Alternative A: No Action**

Under the No Action Alternative, FWP would not implement annual pheasant releases on state-owned lands and there would not be additional hunting opportunity for youth and others.

**Alternative B: Proposed Action**

Under the Proposed Action, FWP would implement annual pheasant releases of up to 50,000 birds on state-owned lands as part of agency wide R<sup>3</sup> efforts. Pen-raised pheasants would be released annually on state-owned lands September through November to provide additional opportunity for hunters, especially youth hunters. Some releases would be scheduled to occur a few days before the youth pheasant season opener to maximize opportunity for youth hunters, and some releases could occur later in the months of October and November to increase hunting opportunities for hunters of all ages.

The public was notified in the following manner to comment on this EA, the proposed action, and alternatives:

- Two public notices in each of these papers: *Independent Record*, *Billings Gazette*, *Bozeman*

*Chronicle, Glasgow Courier, Missoulian, Great Falls Tribune, Miles City Star, and Daily Interlake*

- One statewide press release
- Public notice on the Fish, Wildlife & Parks web page: <http://fwp.mt.gov>.
- Copies of the EA were available from Regional FWP offices, on the FWP web site, and the Montana State Library.
- The public comment period ran from January 28, 2022 to 5:00pm on February 28, 2022.

### **FWP Recommended Alternative and Final Decision**

After extensive review of public comments, applicable state and federal laws, I find Alternative B to be the preferred alternative and support the annual release of pen-raised ring-necked pheasants on suitable state lands.

### **Summary of Public Comment**

FWP received a total of 227 comments, representing 210 commenters<sup>1</sup>, including one tribe and six NGOs during the 30-day public comment period. See Appendix A for a summary of topics raised by commenters and agency responses and Appendix B for a compilation of all comments received during the public comment period. As many people sent in similar comments, we have summarized and synthesized those into representative comments, questions, or observations and then responded to those broad concerns.

Comments covered a wide range of topics including concerns about the cost of the program, impacts to native birds and wild pheasants, questions about the effectiveness of pheasant releases in pursuit of R<sup>3</sup> goals, and support of the program. The most common comment was a desire to support and promote pheasant and other upland game bird hunting through habitat improvement efforts, which is not an allowed use of these funds. Most comments were not directly relevant to the purpose of this EA.

### **Decision**

Based upon the Draft Environmental Assessment and the applicable laws, regulations, and policies, we have determined that the proposed action will not have significant negative effects on the human and physical environments associated with this project. Therefore, we conclude that the EA is the appropriate level of analysis, and preparation of an Environmental Impact Statement is not warranted.

The selected action would further R<sup>3</sup> objectives in Montana by creating additional hunting opportunities, especially youth hunters, which was the purpose behind this legislation. By notification of this Decision Notice, the draft EA is hereby made the final EA. The selection of Alternative B, the Proposed Action, is the product of this Notice.

Respectfully,

  
Hank Worsech, Director

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<sup>1</sup> Some commenters submitted comments 2 or more times, and some comment submissions were "signed" by 2 or more people but are counted as one comment.

## Annual release of pen-raised ring-necked pheasants Questions\* and FWP Responses

\*Questions and observations are all paraphrased from public comments and presented as representative themes. Some themes, such as the cost of the program, arise several times in different contexts.

### Procedural Questions/Concerns

1: The EA as currently written is insufficient in detail and performance metrics.

*FWP Response 1: This EA is consistent with other environmental assessments the department has conducted for projects that have no anticipated significant impacts. Pheasant releases have been a long-term activity in Montana with few documented conflicts or negative impacts. Based on these factors, it is FWP's conclusion that pen-raised pheasant releases do not represent a significant threat to wild pheasants or other wild birds, and the scope of the draft EA examining this proposal is appropriate. See also FWP Responses 37-39.*

2: This action appears to be predetermined as the program already started with several pheasant releases on WMAs in Regions 3, 4, 5, and 7 in 2021.

*FWP Response 2: The pheasant releases on WMAs in Regions 3, 4, 5, and 7 in 2021 were funded by FWP's Upland Game Bird Enhancement Program (UGBEP) and covered under a previous EA. This EA analyzes future pheasant releases funded through a legislative appropriation during the 2021 legislative session. If approved, these releases would begin in the fall of 2022. The separate nature of these actions was not made clear in the draft EA.*

3: The No Action Alternative is not a viable alternative.

*FWP Response 3: The No Action Alternative is a viable option as FWP could choose not to release pheasants on state-owned land.*

### The Legislative Origination of this Project

4. Montana FWP abandoned its pen-reared pheasant stocking program decades ago and there has been no large push to restart the program from Montana pheasant hunters. Where is the justification for this program which lacks support from many stakeholder groups?

*FWP Response 4. FWP has received support for this program from stakeholders.*

5. We object to having politicians make wildlife management decisions.

*FWP Response 5: This comment/concern falls outside the scope of this EA. However elected and appointed state officials are the trustees of public natural resources and FWP is a trust manager. The trustees make decisions and trust managers implement them. The pheasant program is no different than any other program that FWP implements. FWP has received support from stakeholders on this program.*

### Cost of the program

6. If hunter recruitment is the goal, funds would be better spent on habitat improvement, youth hunter education, and access.

7. Funds should be spent to improve hunting opportunities for wild birds, not farmed ones.

*FWP Response to comments 6 and 7: The appropriation in HB637 cannot be used for habitat improvement, youth hunter education, access, or any other use. FWP implements the Upland Gamebird Enhancement Program which improves habitat for upland gamebirds. It is a separate source of funding. The appropriation in HB637 may only be used for the purchase of pheasants to be released on state lands.*

8. The public seems to regard raising fish for stocking more favorably than raising birds for stocking. What is the difference?

*FWP Response 8. FWP provides a variety of hunting, fishing, and recreational opportunities for the public. Stocking fish and pheasants are very similar in that they are raised for harvest opportunities.*

9. Why pay for and release hen pheasants when they can't be legally taken and their contribution to wild populations is negligible at best?

*FWP Response 9. The prison can only maintain so much brood stock. While FWP will be releasing mostly roosters, hens will be released as well.*

### **Spending money on habitat is good for all wildlife**

10: Habitat efforts potentially spent on pheasants would also provide a wide range of benefits to other wildlife species, water quality, soil health, and other natural resources. Shouldn't the Department therefore be investing in habitat improvements for pheasants instead of stocking them?

*FWP Response 10: Since the late 1980's, FWP has invested heavily in habitat enhancement and management for the benefit of game birds through the Upland Game Bird Enhancement Program and Migratory Bird Wetland Program, and more recently through the Working Grasslands Initiative. In addition to game and nongame wildlife habitat benefits, these programs help support many of Montana's agricultural operations. Many of the habitat enhancement and conservation projects result in improvements in soil health and water quality by increasing biomass, reducing erosion, and intercepting nutrient loads and sediments before they enter waterways. However, the appropriation in HB637 cannot be used for habitat improvement, youth hunter education, access, or any other use.*

### **Effectiveness of pheasant release programs on achieving R<sup>3</sup> objectives**

11. This EA seeks to justify this program as a way of recruiting young hunters. But FWP has provided no evidence that the program will attract and retain hunters and has not provided cost-benefit comparison with other hunter recruitment programs.

12: There is a lack of detail in the EA about how the program will be implemented to maximize R<sup>3</sup> objectives.

13: Clear program details including how the program will be implemented to achieve R<sup>3</sup> objectives and how success will be measured should be in place before the 2022 youth hunt. This data needs to be available prior to the 2023 legislative session.

*FWP Response 11-13. The primary purpose of an Environmental Assessment (EA) is to inform the public of potential impacts to the human and physical environment from a proposed project or action taken by the agency, in this case the proposed release of pheasants on state lands. Cost-benefit comparisons of this effort and detailed success metrics are outside the scope of this EA but will be addressed in FWP's R<sup>3</sup> Plan, which is currently being developed and is expected to be completed in fall of 2022. Any data collected would be available for the 2023 legislative session.*



14. It appears unlikely that providing expanded shooting opportunities for a few days each season would result in long-term hunter recruitment or retention.

*FWP Response 14: FWP is exploring ways to evaluate this program with the goal of learning if this opportunity does lead to long-term hunter recruitment or retention.*

15. Pheasant releases engender unrealistic expectations among new participants and do not provide an accurate experience of true upland game bird hunting.

*FWP Response 15: This opportunity allows new hunters a chance to build their skills so they can continue hunting upland birds. It is meant to remove barriers to success so they can grow their confidence and move on to hunting in other environments.*

16: I am in full support of the pheasant release plan. Pen raised birds can work to increase hunter recruitment, while habitat enhancement projects can also increase the long-term pheasant populations.

17: FWP should strategically coordinate and promote new hunter opportunities and hunter access programs rather than wild bird augmentations. These are the investments that will sustain both wildlife and hunting long into the future.

*FWP Response 16 and 17: This program is one tool that could enhance opportunity for both youth and adult hunters. FWP will continue to support habitat access programs and understands the importance of healthy habitat for all the species it manages.*

18: The challenge and feeling of accomplishment that comes with hunting wild birds is what will recruit new hunters, not hunting pen-raised birds.

*FWP Response 18: A new hunter has many challenges and if this effort helps build confidence by increasing the odds of success of harvesting a bird, it may lead to a long-term upland bird hunter. FWP is exploring ways to evaluate success and measure the effectiveness of this program.*

#### **Number of birds to be released**

19: How was the maximum number of 50,000 birds determined?

*FWP Response 19: The appropriation identified in HB637 was for \$1 million. The average cost of a pen-raised pheasant is \$20. The appropriation would allow for up to 50,000 birds to be purchased.*

20: Releasing pen-raised pheasants does not lead to an increase in pheasant populations.

*FWP Response 20: The primary objective of this appropriation is to increase hunter opportunity, not to increase pheasant populations. The Upland Gamebird Enhancement Program remains the principal means to achieve habitat improvements and population increases in upland gamebirds.*

21: How does 50,000 birds compare to the annual harvest of wild pheasants in Montana over the last three years? How many wild birds are currently harvested by youth hunters?

*FWP Response 21: Harvest fluctuates greatly over time, and the last few years have been on the lower side. This table shows statewide harvest estimates for the most recent five-year period. FWP doesn't break harvest down by hunter age.*

2015	132,169
2016	111,898

2017	76,052
2018	53,975
2019	59,589
2020	87,203

### **Concern about Fair Chase Ethics**

22: FWP should be promoting fair chase ethics and instilling in young hunters the challenge and sense of accomplishment that comes with fair chase.

23: Pen-raised birds do not provide a shooting challenge and is akin to shooting game at a game farm. Most hunters want to hunt wild birds.

*FWP Response 22 and 23: The prison bought their brood stock for the program from one of the most reputable pheasant producers in Montana. The birds are not tame and will provide a challenging hunting opportunity.*

*Of the 78 youth hunters interviewed during the 2021 youth pheasant opener, only one said they were unsatisfied with the hunt (they did not harvest a bird), three were neutral, and 72 responded they were satisfied or very satisfied (two did not respond in an online survey). All youth hunters responded that they planned to hunt pheasants in 2022. Only 14 accompanying adults responded that the pheasant release did not influence their decision on where to hunt.*

24: Birds provided for pheasant releases are young, often not fully feathered, and do not exhibit appropriate wariness or other wild behavior. They often are unable to fly any distance and can be easily caught by dogs. That does not seem to support ethical hunting or the program's objectives.

*FWP Response 24: Future releases will be birds that are at least 18-weeks old. At this age, they are completely feathered and colored.*

25: This proposal cheapens and demeans the spirit of sportsmanship and fair chase that we Montanans have always taken pride in.

26: This sounds like put and take hunting. It is not fair to the pheasants and not fair to hunters. This is not how Montana works.

*FWP Response 25 and 26: A new hunter has many challenges and if this effort helps build confidence by increasing the odds of success of harvesting a bird, it may lead to a long-term upland bird hunter.*

### **Use of the State Prison for raising of pheasants**

27: What is the breakdown in allocation of funding to assist with the development of facilities at the State Prison? What will be the projected annual maintenance cost required to support this program? What level of funding is the Department of Corrections dedicating to the program?

28: The state of Montana closed the state-run pheasant hatchery at Warm Springs in the mid-1980's because of the high cost of raising birds. We are now watching the commitment of \$1M annually to resurrect a program that was cost ineffective. This is fiscally irresponsible.

29: Having the state prison raise the birds is a great idea. That keeps costs down compared to private growers.

*FWP Response 27-29: The prison lost its dairy operation in 2021 and the state legislature saw raising pheasants as a good opportunity for the prison and its inmates. The prison will be retrofitting infrastructure to accommodate raising pheasants. The prison will be providing staff time to run the program. FWP can spend up to \$1 million each year for the prison to manage the pheasant program.*

30. If FWP chooses to proceed I urge it to make the minimal investments in the infrastructure needed to raise pheasants at the State Prison. These investments will be stranded if the program is terminated.

*FWP Response 30: HB637 states that the legislature intends that the appropriations for this program be considered as part of the ongoing base for the 2023 legislative session.*

31: It would be better to teach prisoners trade occupations.

*FWP response 31. That is outside the scope of this EA.*

### **Safety Concerns**

32: Concentrating youth hunters onto popular public areas creates certain safety concerns. Were there any specific hunting related accidents during the 2021 youth pheasant hunt?

33: Upland hunting is inherently dangerous and requires quick thinking and good judgement under all circumstances. Mixing weak, low flying, pen raised pheasants and new hunters is an accident waiting to happen.

*FWP Response 32 and 33: There were no safety-related incidents during the 2021 youth pheasant opener.*

### **Release Locations**

34: Will any of the pen-raised pheasants be released in wilderness study areas or wilderness areas?

35: Is there any opportunity for the program to expand and include federal refuge lands?

*FWP Response 34 and 35: HB637 specifies that pheasants will be released on state lands only.*

36: While it is unlikely that most released birds will live long, either due to harvest or predation, will there still be adequate habitat for birds to live on and hopefully reproduce should they survive their initial release?

*FWP Response 36: FWP only will release birds in suitable habitat.*

### **Potential impacts to native birds and wild pheasants**

37: How will this proposal affect native birds? Is there a risk of transmission of disease from the pen-raised pheasants to native birds and the predators that might eat them?

*FWP Response 37: There is the potential for disease transmission between pen-raised pheasants and wild pheasants and native birds. However, despite conducting pheasant releases over the past 35 years, we are not aware of any documented pathogen transmission between pen-raised pheasants and wild pheasants or other wild birds in Montana. The typically short lifespan of released pheasants reduces the opportunity and degree for mixing with wild bird populations. FWP is also required to derive our source birds from National Poultry Improvement Plan (NPIP) hatcheries that meet testing standards and are subject to Department of Livestock (DOL) oversight. The State Prison will have biosecurity and health protocols in place.*



38: FWP acknowledges the potential for disease transfer existing between these pen-reared birds to the wild population of pheasants but does not provide any information on how the Department will monitor and/or mitigate for these potential impacts.

*FWP Response 38: FWP has not documented pathogen transmission in the 35 years we have been releasing birds, so there is no plan to intensively study any disease transfer between pen-reared pheasants, wild pheasants, and other wild birds. FWP monitors the health of all species by investigating morbidity and mortality events reported to us by the public or FWP staff, and through disease surveillance programs (e.g., CWD, brucellosis, White Nose Syndrome) but there is not currently a specific disease surveillance program for wild pheasants in Montana. All pheasant producers providing birds to FWP are required to derive their source birds from NPIP certified hatcheries that meet testing standards and are subject to DOL oversights. NPIP offers testing and monitoring for some of the key pathogens of Galliformes. <http://www.poultryimprovement.org/default.cfm?CFID=859148&CFTOKEN=ab01a7c1158756f2-FFCBB266-FC5F-9229-34D10695823FC200>*

39: FWP has proposed to release pen-reared birds in areas with quality habitat and known wild pheasant populations. These releases will likely cause displacement of wild pheasants and other wildlife from increased human disturbance. How will the Department monitor and mitigate for these impacts?

*FWP Response 39: Concentrated human/hunter presence at pheasant release areas may result in more than normal stress to wildlife populations. However, releases will be conducted at sites relatively close to major roads that already receive recreational pressure. The potential increase in human presence will be a short duration.*

40: FWP should stop all stocking of non-native species, including pheasants.

*FWP Response 40: FWP provides a variety of hunting, fishing, and recreational opportunities for the public. Stocking harvestable species provides opportunities for hunters and anglers. For the UGBEP, FWP is statutorily required to release upland game birds.*

#### **Loss of habitat is primary limiting factor for pheasant populations/hunter opportunity**

41: Drought and loss of CRP is a major factor in reduction in pheasant populations. What is FWP doing to address this?

42: We seem to have opposition from people in our state who say we need the money focused on habitat. The best habitat in the country can't support enough birds for the western Montana population.

*FWP Response 41 and 42: Over the years, the reduction in CRP enrollments in Montana has negatively influenced pheasant production in Montana. Pheasant harvest has declined by about one-third since CRP's peak in the 1990s. The Upland Game Bird Enhancement Program focuses extensively on "Life After CRP" habitat activities, recognizing that another CRP peak is not likely in the coming years. The program focuses on habitat management leases, where productive game bird habitats are idled for wildlife benefits and public hunting opportunity. When possible, the program complements CRP enrollments by offering add-on CRP rental payments, known as Open Fields, or assistance with seed costs. The program has adapted to opportunities offered through the Federal Farm Bill, including enhancing pheasant habitat with interested landowners and partners when Farm Bill opportunities are not available. In the past three years, Montana reports a positive trend in the number of pheasant hunters, number of days afield, and number of pheasants harvested.*

*Estimated pheasant harvest and hunting activities in Montana in recent years.*

License Year	Number Hunters	Number Days	Number Harvested
2018	14,668	73,364	53,975
2019	14,545	78,084	59,589
2020	17,154	91,889	87,203

#### **Scientific basis supporting pheasant releases**

43: FWP's 2004 review of upland game bird biology and habitat relationships as part of the Upland Game Bird Habitat Enhancement Program states, "Stocked birds contribute little to harvest or population growth in pheasant populations. In Montana, Weigand and Janson (1976) noted that hunters subsequently harvested only 13%-24% of pheasants released 1-3 weeks prior to hunting season opening." We trust FWP to make sound biological decisions when managing our wildlife and question why it would go against its own science to conduct these releases.

44: FWP has many dedicated wildlife biologists on staff who can attest to the numerous studies that conclude releasing pen raised pheasants is not cost-effective and unwarranted in states that have quality habitat and wild pheasant populations. Our hunting/fishing license dollars pay for these biologists. Listen to them.

45: This runs counter to the North American Model of Wildlife Conservation.

46: This program is neither justified scientifically nor supported by Montana hunters.

*FWP Response 43-46: The primary reason for releasing pheasants under this EA is not for population augmentation, but for hunter recruitment efforts. FWP received positive feedback from all hunters during the 2021 youth pheasant opener and have received written comments from hunters supporting this program. Youth hunters were successful in harvesting pheasants.*

#### **Potential impacts to recreation and tourism**

47: We hope that the Department is likewise not considering release of hatchery trout in our river systems for R<sup>3</sup> programs where wild trout management is the envy of the nation.

48: Please don't try to make Montana a giant pheasant farm like SD.

49: Game farming should not be something you even should have to consider. Support habitat.

50: Montana made the wise decision in the 1970's to stop stocking our rivers with trout and we have seen the benefits compound over time. Montana is now renowned for our truly wild populations of wildlife, whether it be elk, grizzly bear, pheasants, or trout. I feel if we were to spend this money on improving wildlife habitat on these State lands, a similar story could be told in 30 years.

*FWP Response 47-50: We do not believe that continuing to release pheasants for hunting opportunities will harm Montana's reputation as a hunting and angling destination.*

51: I think the release of birds on state land during hunting season is a great idea. I run a lot of Pheasants Forever events, and I see demand for pheasant releases at every event. There are big groups of people in other states who just hunt the WMAs for released birds. It is just another style of hunting.

52: MT offers world-class wild bird hunting opportunities. Hunters come from all over the world to hunt wild upland birds here. Stocking programs have never added materially to the health of our wild birds - they have only provided "targets" for a few weeks each year.

*FWP Response 51-52: Offering additional hunting opportunities will benefit hunter recruitment. We do not believe that continuing to release pheasants for hunting opportunities will harm Montana's reputation as a hunting destination.*

#### **Recruitment/Program is not needed**

53: There are enough pheasants to hunt in MT. We don't need to recruit more hunters to compete on the block management access land where these birds reside. Recruitment is not an issue in MT.

*FWP Response 53: License data over the last ten years points to an overall decline in resident upland game bird hunters. With hunters lapsing or aging out of hunting, the goal of this program is to provide a positive experience to youth in the hopes they continue to choose hunting as a pastime and become advocates for the species they hunt. These birds will only be released on state-owned land, not block management.*

#### **Use of WMAs for this program**

54: Essentially what this EA proposes is to convert our highly valued Wildlife Management Areas into de-facto shooting preserves where pen-reared birds are released throughout the hunting season. Why should public areas developed to sustain wild bird populations compete with existing private shooting preserves offering similar opportunities? Could the Department utilize the same program dollars to cover the costs for released birds during targeted youth hunts on private shooting preserves?

*FWP Response 54: HB637 specifies that pheasants can be released on state lands only.*

#### **Concerns over increased conflicts with Grizzly Bears**

55: While the project size includes suitable pheasant habitat occurring outside of the grizzly bear recovery zones, it should be noted that grizzly bears have expanded their range beyond some of these recovery zones. Recovery of the species relies on connectivity between recovery zones and the increase of pheasants through release in these areas should be considered when evaluating impacts to grizzly bears as a Threatened species of the ESA. PART II. ENVIRONMENTAL REVIEWCHECKLIST 5h. indicates that there would be a 'Minor' effect on grizzly bears outside of recovery zones in areas with documented or potential bears. This section mentions that releasing the birds would unlikely impact grizzlies, however the release of pen-reared pheasants on habitats with known grizzly presence and activity could increase hunter-grizzly encounters. These encounters could result in human injury or grizzly bear fatality as hunting does occur in surrounding areas with grizzly bear habitat. An increase in these types of encounters could impede the natural connectivity and gene flow between recovery zones.

*FWP Response 55: While stocking of pen-raised pheasants may temporarily increase food biomass in areas where grizzly bears may be present, it will also attract a significant amount human activity related to the stocking of birds and hunting of them. The activity is expected to be short in duration (1-2 days after birds are released) and concentrated in relatively small areas. The amount of human activity is likely to deter bears away from where the activity is occurring. This in turn will minimize potential for encounters between bears and people there to hunt the stocked birds. FWP will continue to press the bear awareness message including in news releases and other information related to the pheasant stocking.*

#### **Suggestions to improve the program should it go forward**

Suggestion 1: I'm the VP of the Big Sky Chapter of the National Shoot to Retrieve Association. This is an upland field trial group. Our membership of over 60 people has voiced their support for the importance of recruiting youth and I know our members that I visited with all support the mentoring of youth in the field. We would love to see this program in the future have mentors paired with youth who don't have an

opportunity to hunt or do not have a hunting dog. We can provide the dog and provide solid mentoring to these kids. I have been involved in this for approximately 5 years through our Pheasants Forever chapter in the Flathead Valley. It is very rewarding.

*FWP response 1: FWP will be looking to partner with groups to help mentor youth prior to and during the youth pheasant opener.*

Suggestion 2: Releases should occur as far away as possible from established wild pheasant populations. Frankly, I would treat suitable pheasant habitat as a negative factor for identifying proposed release locations. Instead, I recommend ranking release areas based primarily on distance from areas occupied by wild pheasants and proximity to areas likely to be used by targeted user groups. I would go as far as selecting release sites via a GIS analysis showing overlap of those 2 criteria.

*FWP Response 2: FWP cannot release pheasants where there is no suitable habitat.*

Suggestion 3: Releases of pen-raised birds should occur as close as possible (in time) to targeted harvest opportunities. i.e., the morning of or evening before hunting commences to maximize return (birds harvested).

Suggestion 4: I am in favor of the state releasing pen raised pheasant. However, I think they should be released several weeks ahead of opening day.

*FWP Response 3 and 4: For the best hunting opportunity, pheasants will be released 1-3 days prior to the youth opener.*

Suggestion 5: Maybe some of the money should go to habitat and some to released birds.

*FWP Response 5: The appropriation in HB637 cannot be used for habitat improvement or anything except for the purchase of pheasants to be released on state lands.*